

FILED

9/1/2022

MBH

22-CR-437THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JULIAN VALTIERRA
also known as "Goofy" and
KIARA SANTANAViolations: Title 18, United States Code,
Section 844(i); Title 18, United States
Code, Section 844(n)**UNDER SEAL**COUNT ONE

The SPECIAL JULY 2021 GRAND JURY charges:

1. At times material to this indictment:

a. Individual A was the registered owner of a Lexus ES 300h sedan bearing vehicle identification number JTHBW1GG7D2009917 (the "Lexus").

b. Individual A leased the Lexus to KIARA SANTANA, who agreed to pay Individual A a regular monetary sum as part of the lease agreement.

c. On or about December 29, 2019, while KIARA SANTANA was driving the Lexus, it was used to commit a drive-by shooting on the 3000 block of West 39th Place in Chicago.

2. On or about December 29, 2019, at Oak Lawn, in the Northern District of Illinois, Eastern Division, and elsewhere,

JULIAN VALTIERRA, also known as "Goofy," and
KIARA SANTANA,

defendants herein, did conspire with each other and Individual B to maliciously damage and destroy by means of fire a vehicle, namely the Lexus, which was used in

interstate commerce and in an activity affecting interstate commerce, in violation of Title 18, United States Code, Sections 844(i).

3. It was further part of the conspiracy that defendants and Individual B did conceal and hide, and caused to be concealed and hidden, the existence of and acts done in furtherance of the conspiracy.

In violation of Title 18, United States Code, Section 844(n).

COUNT TWO

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about December 29, 2019, at Midlothian, in the Northern District of Illinois, Eastern Division,

JULIAN VALTIERRA, also known as "Goofy," and
KIARA SANTANA,

defendants herein, maliciously damaged and destroyed by means of fire a vehicle, namely a Lexus ES 300h sedan bearing vehicle identification number JTHBW1GG7D2009917, which was used in interstate commerce and in an activity affecting interstate commerce;

In violation of Title 18, United States Code, Section 844(i).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY